

Document Page 1 of 8  
UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEYU.S. BANKRUPTCY COURT  
FILED  
NEWARK, NJ

RE: Yvonne Manuel	)	Case No.: 16-31281-MBK	2022 OCT 26 P 3:13
	)		JEANNE A. NAUGHTON
	)	Chapter 13	BY: <i>Rob Heron</i>
	)		DEPUTY CLERK
Debtor	)		
	)		

**OBJECTION TO APPLICATION FOR PAYMENT OF UNCLAIMED FUNDS (DOC 61)**

The undersigned, Jairo Camargo as Managing Member of Adams & Cohen, LLC objects to the Application For Payment of Unclaimed Funds (DOC 61) for the following reasons:

The Debtor's attorney, Peter Zinnis, filed an opposition to our Application For Payment of Unclaimed funds (DOC. 54) filed with this Honorable Court on September 16, 2022.

On the opposition, the Debtor, Yvonne Manuel provides a sworn statement to this Honorable Court. Our answer to her opposition statements per her paragraphs:

**Paragraph 3.** She states the letter we emailed her did not disclose the origin of the unclaimed funds. "Exhibit A" is the letter we first emailed her on September 7, 2022, it clearly states the source of the funds in RE: Bankruptcy Case. We also told her, prior to sending her the letter, that the funds were from her bankruptcy case filed by her in 2016. She understood and said, "Thank you because I can use the money for my grandkids".

**Paragraph 4.** She stated in her opposition paragraph four that she was not thinking "rationally" so she agreed to sign our contract. See Exhibit "B", since it sounded like "free money". We never told her it was "free money". It is also noted that Ms. Manuel was a former government employee. We believe that she can read and write.

**Paragraph 6.** She states that "she assumed that we were licensed attorneys without us ever telling her we were attorneys", which we never did as she stated.

**Paragraph 7.** She was never pressure by us as she was free to make up her mind and decisions. She signed the Assignment Agreement on September 9, 2022, see "Exhibit C", two days later signing our contract, which on paragraph one clearly states the case number, the debtor, the amount, and the United States Bankruptcy Court for the District of New Jersey.

**Paragraph 9.** She was happy with our fee of \$1,500.00 for our services and thanked us for making her aware of her unclaimed funds from her previous bankruptcy case. In her opposition statement she changed her mind.

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Paragraph 10.** This was a clerical error, and it was corrected later and sent to her to sign.

**Paragraph 12.** There was not any pressure on our part.

**Paragraph 17.** The Unclaimed Funds became available on September 7, 2022. The debtor's attorney never contacted her to inform her of her unclaimed funds. She became aware of them only when we told her so.

**Paragraph 18, 19 and 22.** Again she was told that the unclaimed funds were from her bankruptcy case of 2016. She was told so on all our conversations prior to her signing the Assignment Agreement.

**Paragraph 23,24 and 25.** Again we never told her we were attorneys as she clearly mentions. It is noted, you do not have to be an attorney in this Honorable Court to file an Application For Payment Of Unclaimed Funds on behalf of a claimant.

**Paragraph 27.** She agreed and signed the Assignment Agreement two days letter after she received it, so she had enough time to review it. See Exhibit "C".

**Paragraph 30.** We could not have been any clearer in our conversations with Ms. Manuel. The entire process was explained to her in basic terms on our first conversation. She appeared coherent and understanding during all our conversations.

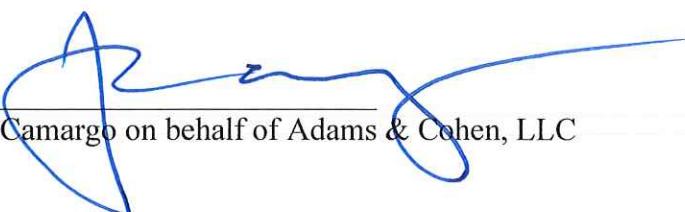
**Paragraph 35, 36 and 37.** Do not appeared to be her statement but her attorney.

**Paragraph 37.** Our Assignment Agreements are being filed daily by us and other "funds locators" in mostly all Bankruptcy courts in the United States.

**WHEREFORE**, it is hereby respectfully requested from this Honorable Court to take note of the above false statements by the Debtor, Yvonne Manuel, accept our Application (DOC 54) and issue an Order for the Clerk of this Bankruptcy Court to pay said unclaimed funds in the amount of \$5,006.41 held in favor of Claimant, payable to Adams & Cohen, LLC and to send said payment to P O Box 2784, Auburn, AL 36831.

**RESPECTFULLY SUBMITTED.**

Dated: October 19, 2022

  
\_\_\_\_\_  
Jairo Camargo on behalf of Adams & Cohen, LLC

## ADAMS & COHEN

841 Prudential Drive, Suite 1200  
Jacksonville, FL 32207  
E-mail: [admin@adamscohen.com](mailto:admin@adamscohen.com)

Tel (904) 204-9148  
Fax (888) 978-2226

---

September 7, 2022

Ms. Yvonne Y Manuel  
10 Fairway Lakes Drive, Apt A21  
Dover, DE 19904

RE: Bankruptcy Case

Dear Ms. Manuel:

This is to inform you of **\$5,006.41** the government is retaining for you. A check was issued, but it was undelivered or not cashed. These funds are now deposited with the U.S. Treasury and are available for you to obtain.

**Would you like to obtain these funds?** If so, we can get them for you in just a couple of weeks without any upfront fees to you.

We are a licensed and registered funds retrieval firm of unclaimed funds in the United States. **We are an Accredited Business with the highest rating and review of all the unclaimed funds retrieval firms with an A+ Rating and 5/5 of all reviews with the Better Business Bureau.** We are also registered as Claimant's Representatives with the State of Florida and U.S. Treasury.

For the past twenty-one years, we have successfully obtained over \$529 millions of unclaimed funds for businesses and individuals, which they did not know belonged to them. We have an excellent record in recovering unclaimed funds. We would like to obtain these funds for you.

We work only on a contingency fee basis, which means our fee is due only after you have received your money. Once again, we do not require an upfront fee and we will not charge you a fee if for some reason we do not recover your funds.

Enclosed you will find our Services Agreement. Please read it, and if you would like our firm to proceed with this claim to obtain your funds, please sign it and return it to us by e-mail, text, fax or mail.

Once we receive the agreement, we will send you the required form(s) to process your claim. When you return the form(s) to our office, we will immediately file your claim and keep you inform of the status of your claim until the government issues you a check.

If you have any questions or need additional information, please contact our office.

Sincerely,

Jerald Camargo



A+ Rating

State of Florida License: A9900096

[adamscohen.com](http://adamscohen.com)

## EXHIBIT "A"

# ADAMS & COHEN

841 Prudential Drive, Suite 1200  
Jacksonville, FL 32207  
E-mail: admin@adamscohen.com

Tel 904-204-9148  
Fax 888.978.2226

## AGREEMENT FOR THE RECOVERY OF UNCLAIMED FUNDS

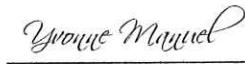
This Agreement is for the Recovery of Unclaimed Funds between Adams & Cohen, LLC, a Florida LLC corporation ("A&C") and Ms. Yvonne Manuel ("CLIENT").

- (1) Adams & Cohen, LLC agrees to recover from the U. S. Treasury, and return to CLIENT Unclaimed Funds belonging to the CLIENT in the amount of **\$5,006.41**.
- (2) Upon the return of this signed Agreement, A&C will provide to the CLIENT with the form(s) required for obtaining these Funds and CLIENT agrees to return them and evidenced as required by the U.S. Treasury to collect these unclaimed funds.
- (3) CLIENT agrees that he/she will not pursue these funds through an alternative source or independently from A&C.
- (4) CLIENT agrees to pay A&C **\$1,500.00** of the Funds collected only after you have received your Funds.
- (5) This Agreement shall remain in effect until the CLIENT has received the Funds and A&C has been compensated per this agreement.
- (6) We abide by the Privacy Act. All information obtained during this claim is kept private and confidential.

Adams & Cohen, LLC

  
\_\_\_\_\_  
Jerald Camargo

CLIENT:

Signature:  Date **9-7-22**  
Phone: **609-510-7804**  
Email: **ymanuel@yahoo.com**

**PLEASE SIGN AND RETURN BY E-MAIL, FAX, MAIL or TEXT**

**FAX Line: 888-978-2226**

**Text Line: 305-788-9772**

**Mailing Address: P O Box 2784, Auburn, AL 36831**

## **EXHIBIT "B"**



**A+ Rating**

State of Florida License: A9900096

adamscohen.com

**ASSIGNMENT**

This Assignment Agreement ("Agreement") is entered into on the 9th day of Sept, 2022 by and between Yvonne Manuel, 10 Fairway Lakes Drive, Apt. A21, Dover, DE 19904 ("Assignor") and Adams & Cohen, LLC, a Florida Limited Liability Company, 841 Prudential Drive, Suite 1200, Jacksonville, FL 32207 ("Assignee").

1. Assignor is/ was a debtor/ creditor in Bankruptcy Case #16-31281 Debtor (s): Yvonne Manuel and filed in the United States Bankruptcy Court District of New Jersey ("Bankruptcy Case"). In his/ capacity as debtor/ creditor, Assignor was entitled to a distribution of funds in the amount of \$5,006.41 ("Funds"), remittance was attempted by the Trustee at the Assignor's last known address. Such remittance was not negotiated, however, and pursuant to Federal Rule of Bankruptcy Procedure 3011 and 11 U.S.C. 347, the Trustee remitted the funds to the Clerk of the Court for payment on to the Registry of Unclaimed Funds. Such Funds are subject to withdrawal as provided by 28 U.S.C. 2042.
2. Rather than attempting to collect the Funds- and in an effort to both save the expense of such a collection, as well as to expedite the liquidating of their interest in the Funds- Assignor desires to legally assign his/ her interest in such Funds and Assignee desires to purchase and obtain such interest in the Funds. Therefore, with both parties being of sound mind, and operating in the manner in which they deem to be in their mutual best interest, Assignor shall convey all rights, title and interest that Assignor has in the Funds and the Claim which generated same, and Assignee shall purchase all rights, title and interest that Assignor has in the funds and such Claim as generated same.
3. For Good and valuable consideration, the Assignor does hereby irrevocably transfer and assign to Assignee and assigns, all of his/ her rights, title and interest to Assignee in reference to this Claim/ Funds.
4. Consideration: The consideration herein given by Assignee to Assignor shall be the sum of \$3,506.41 which sum shall be remitted to Assignor. A check will be issued to the Assignor for the above stated amount once this claim is approved.
5. This assignment shall be deemed an absolute and unconditional assignment of Claim for the purpose of collection and satisfaction shall not be deemed to create a security interest.
6. Assignor represents and warrants to Assignee that no payment or other distribution has been received by or on behalf of Assignor in full or partial satisfaction of the assigned rights; that Assignor has not previously sold or assigned the rights, in whole or in part, to any party.
7. Assignor hereby irrevocably appoints Assignee, Adams & Cohen, LLC, as its true and lawful attorney-in-fact to act in Assignor's stead with respect to the Claim/ Funds assigned.
8. This Agreement constitutes the entire agreement and understanding between the parties with respect to the subject matter above.

IN WITNESS WHEREOF, the undersigned have duly executed this Agreement by their duly authorized representatives as of the above Date of this Agreement.

ASSIGNOR: Yvonne Manuel



Signature: Yvonne Manuel

ASSIGNEE: Jairo Camargo for Adams & Cohen, LLC

  
Signature: Jairo Camargo

On this 12th day of Sept, 2022, I, Jairo Camargo Certify that the preceding or attached document titled Assignment Agreement (1) Page(s), is a true, accurate, complete redacted copy of the original being kept at 841 Prudential Drive, Suite 1200, Jacksonville, FL 32207.

Notary Public State of Florida



Oalenys B Alba  
Comm. # GG324795  
Expires: May 13, 2023  
Bonded Thru Aaron Notary

**EXHIBIT "C"**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Adams & Cohen, LLC  
P O Box 2784  
Auburn, AL 36831  
904-204-9148

In Re:

Yvonne Manuel

U.S. BANKRUPTCY COURT  
FILED  
NEWARK, NJ

2022 OCT 26 P 3:14

JEANNE A. NAUGHTON

BY: Rob Heen  
DEPUTY CLERK

Case No.: 16-31281 (MBK)

Chapter: 13

Adv. No.: \_\_\_\_\_

Hearing Date: \_\_\_\_\_

Judge: Michael B Kaplan

**CERTIFICATION OF SERVICE**

1. I, Jairo Camargo :

represent \_\_\_\_\_ the creditor \_\_\_\_\_ in this matter.

am the secretary/paralegal for \_\_\_\_\_, who represents \_\_\_\_\_ in this matter.

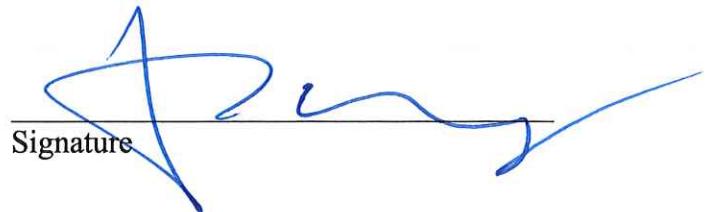
am the \_\_\_\_\_ in this case and am representing myself.

2. On October 19, 2022, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

Objection To Application For Payment of Unclaimed Funds (DOC 61) and Exhibits

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Date: October 19, 2022

  
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Albert Russo, Ch 13 Trustee P O Box 4853 Trenton, NJ 08650	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
U S Trustee U S Dept of Justice Office of the U S Trustee One Newark Center, Suite 2100 Newark, NJ 07102	Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
Office of the United States Attorney District of New Jersey 970 Broad Street, Suite 700 Newark, NJ 07102	U S Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
Yvonne Manuel, Debtor 10 Fairway Lakes Drive, Apt. A21 Dover, DE 19904	Debtor	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other Email _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>
John Zimnis, Debtor's Attorney 1245 Whitehorse-Mercerville Rd Suite 412 Trenton, NJ 08619	Debtor's Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ <small>(As authorized by the Court or by rule. Cite the rule if applicable.)</small>

READY

